

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

BRIAN BELL,

Plaintiff,

v.

O'REILLY AUTO ENTERPRISES, LLC d/b/a  
O'REILLY AUTO PARTS,

Defendant.

Civil Action No. 1:16-cv-00501-JDL

PLAINTIFF'S PROPOSED VOIR DIRE

Plaintiff proposes that the Court include the following voir dire questions during the jury selection either orally or by written questionnaire. Plaintiff believes that asking these questions in a written questionnaire provided to potential jurors in advance of jury selection would be most effective.

Dated: September 29, 2021

/s/ Chad T. Hansen  
Chad T. Hansen  
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2021, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which then electronically notified all those registered as CM/ECF participants in this case.

/s/ Chad T. Hansen

## JUROR QUESTIONNAIRE

Questions about various experiences you may have that might be relevant to the issues raised in the case for which a jury will be selected. You are being asked the questions on this questionnaire, rather than in the courtroom, in order to protect your privacy and to allow for a more efficient jury selection process. The information on this questionnaire will only be viewed by the judge and attorneys involved in the case, and will only be used for the purpose of jury selection. Please read each question carefully, and give a complete and accurate answer. Thank you for your cooperation.

JUROR'S NAME AND JUROR NUMBER:

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1. Have you, or a close family member ever been terminated from employment for reasons you believe were unfair or discriminatory?

YES\_\_\_\_\_

NO\_\_\_\_\_

2. Have you been involved in the discipline or termination of the employment of another person?

YES\_\_\_\_\_

NO\_\_\_\_\_

3. Have you, or a close family member, or close friend, ever been accused of discrimination or retaliation in the workplace or a violation of an employee's rights?

YES\_\_\_\_\_

NO\_\_\_\_\_

4. Have you, or a close family member, or close friend ever been in a situation where a coworker used an accommodation for themselves or for a family member and that accommodation increased the work load for other employees?

YES\_\_\_\_\_

NO\_\_\_\_\_

5. Do you have any views regarding the role of government that could impact your ability to consider a case involving the application of state and federal employment laws?

YES\_\_\_\_\_

NO\_\_\_\_\_

6. Do you feel that employers should not be required to accommodate employees with restrictions if the employer determines it is not in their business interest to do so?

YES \_\_\_\_\_ NO \_\_\_\_\_

7. Do you feel there should be limits set upon the amount of money damages that juries can award?

YES \_\_\_\_\_ NO \_\_\_\_\_

8. Are you suspicious of people who bring lawsuits?

YES \_\_\_\_\_ NO \_\_\_\_\_

9. During this trial, if a witness says that he or she acted in a certain way for a legitimate reason, but there are circumstances that tend to show that the witness had a different motivation, could you potentially decide that the witness was not being truthful? In other words, would you be able to decide that a witness was not telling the truth about their own motivation?

YES \_\_\_\_\_ NO \_\_\_\_\_

10. Have you ever or do you currently belong to any group or organization that advocates for or against a person's right to file a lawsuit for money damages, or for or against a limitation on the amount of damages a person should be able to recover in a lawsuit?

YES \_\_\_\_\_ NO \_\_\_\_\_

11. Do you tend to believe that discrimination against people with disabilities is no longer a significant problem in the United States?

YES \_\_\_\_\_ NO \_\_\_\_\_

12. Do you believe an employer should have to work with an employee to find an accommodation that will enable the employee to do his job if the employee needs an accommodation because of a disability?

YES \_\_\_\_\_ NO \_\_\_\_\_